

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF BROCKTON RETIREMENT
SYSTEM, Individually and on Behalf of all
Others Similarly Situated,

Plaintiffs,

Civil Action No. 11 Civ. 4665 (PGG)

-vs-

AVON PRODUCTS, INC., ANDREA
JUNG, and CHARLES W. CRAMB,

Defendants.

PLAINTIFFS' NOTICE OF MOTION FOR

**(i) PRELIMINARY APPROVAL OF SETTLEMENT, (ii) CERTIFICATION
OF A SETTLEMENT CLASS, AND (iii) APPROVAL OF NOTICE**

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Brockton Retirement System and the
Louisiana Municipal Police Employees'
Retirement System*

DATED: August 18, 2015

PLEASE TAKE NOTICE that Lead Plaintiffs LBBW Asset Management Investmentgesellschaft mbH and SGSS Deutschland Kapitalanlagegesellschaft mbH (collectively, “Lead Plaintiffs”), and Named Plaintiffs City of Brockton Retirement System, Metropolitan Water Reclamation District Retirement Fund, and Louisiana Municipal Police Employees’ Retirement System (collectively, “Named Plaintiffs,” and, with Lead Plaintiffs, “Plaintiffs”), on behalf of the proposed Class,¹ respectfully move this Court, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for an Order: (a) preliminarily approving the proposed Settlement; (b) approving the proposed form of the Notice and Summary Notice; (c) certifying the Class for purposes of settlement and appointing Lead Plaintiffs and Named Plaintiffs as class representatives and Lead Counsel as class counsel, respectively; (d) approving the proposed methods of disseminating notice; (e) appointing KCC Class Action Services as Claims Administrator; (f) setting a date for the Settlement Hearing; and (g) such other and further relief as this Court deems just and proper. Defendants will not be opposing this motion.

Plaintiffs are contemporaneously filing a Memorandum and accompanying Declaration of Gregg S. Levin and exhibits attached thereto (“Levin Declaration”), incorporated herein by reference, in support of this Motion.

A proposed Order Preliminarily Approving Settlement, Certifying Settlement Class, and Providing for Notice of Settlement is attached as Exhibit C to Exhibit 1 of the Levin Declaration.

¹ Capitalized terms not defined in this Notice of Motion have the meaning ascribed to them in the Memorandum of Law in Support of Plaintiffs’ Unopposed Motion for (i) Preliminary Approval of Settlement, (ii) Certification of a Settlement Class, and (iii) Approval of Notice, or in the Stipulation and Agreement of Settlement dated as of July 22, 2015.

Respectfully submitted,

Dated: August 18, 2015

MOTLEY RICE LLC

By: /s/ Gregg S. Levin

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- All Plaintiffs' counsel consent to the use of their electronic signatures. -

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2015, I caused Plaintiffs' Notice of Motion for
(i) Preliminary Approval of Settlement, (ii) Certification of a Settlement Class, and
(iii) Approval of Notice to be served by the Court's Electronic Case Filing system upon:

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Dated: August 18, 2015
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/s/ Gregg S. Levin
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